

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

GIRARD STREET INVESTMENT  
HOLDINGS LLC

Plaintiff,

v.

PDV HOLDING, INC.

Defendant.

Case No. 24-cv-4448-JSR

(Consolidated for pretrial purposes with Case No.  
1:23-cv-10772-JSR and No. 1:23-cv-10766-JSR)

**DECLARATION OF ALEXANDER A. YANOS IN SUPPORT OF  
NONPARTY HUNTINGTON INGALLS INCORPORATED'S  
AMENDED MOTION TO INTERVENE**

I, Alexander A. Yanos, hereby declare as follows pursuant to 28 U.S.C. § 1746:

1. I respectfully submit this Declaration in support of Nonparty Huntington Ingalls Incorporated's ("Huntington Ingalls") Amended Motion to Intervene. I have personal knowledge about the information in this Declaration.

2. I am admitted to the Southern District of New York and represent Huntington Ingalls in this matter.

3. Attached hereto as **Exhibit A** is a true and correct copy of an excerpt from the transcript of the public hearing held before the District Court of the District of Delaware on December 13, 2024 in *Crystallex Int'l Corp. v. Bolivarian Republic of Venezuela*, No. 1:17-mc-151-LPS.

4. Attached hereto as **Exhibit B** is a true and correct copy of the arbitral award, dated August 29, 2024, rendered by the Tribunal in the case before the International Centre for

Settlement of Investment Disputes captioned *WM Mining Company, LLC v. Mongolia*, ICSID  
Case No. ARB/21/8.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on January 10, 2025.



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